

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

*BNY Mellon, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11767 (GBD) (SN)

*August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD) (SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF PLAINTIFFS’  
MOTION FOR CORRECTIONS TO PARTIAL FINAL JUDGMENTS**

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *BNY Mellon* and *Bernaerts* Plaintiffs in the above-captioned actions, and I submit this declaration in support of the *BNY Mellon* and *Bernaerts* Plaintiffs’ Rule 60(a) Motion for Corrections to Partial Final Judgments at ECF Nos. 7522 and 7527.

2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm’s representation of the *BNY Mellon* and *Bernaerts* Plaintiffs in connection with the September 11, 2001 terror attacks, other court records relating to the multi-district litigation to which the *BNY Mellon* and *Bernaerts* Plaintiffs are parties, conversations had with family members to the *BNY Mellon* and *Bernaerts* Plaintiffs, file records, and conversations with counsel to other September 11<sup>th</sup> plaintiffs.

3. Plaintiffs submit this Rule 60(a) Motion for Corrections to Partial Final Judgment in light of our becoming aware that:

- (1) the middle name of the plaintiff in line 39 of Exhibit A-3 to ECF No. 7522 was incorrectly listed as “Noberto” instead of “Norberto.”

(2) the middle name of the 9/11 victim in line 7 of Exhibit B-1 to ECF No. 7527 was incorrectly listed as “James” instead of “Gregory.”

(3) the middle name of the 9/11 victim in line 4 of Exhibit B-3 to ECF No. 7527 was incorrectly listed as “Girard” instead of “Gerard.”

4. Administrative errors resulted in the misspelling of these names.

5. The corrections requested by Plaintiffs are clerical in nature, do not raise issues with the substantive judgments contained in ECF Nos. 7522 and 7527, and will not in any way change the Court’s disposition.

6. For the foregoing reasons, plaintiffs respectfully request that the Court, pursuant to Fed. R. Civ. P. 60(a), Order the following corrections:

(1) the middle name of the plaintiff in line 39 of Exhibit A-3 to ECF No. 7522 be changed from “Noberto” to “Norberto.”

(2) the middle name of the 9/11 victim in line 7 of Exhibit B-1 to ECF No. 7527 be changed from “James” to “Gregory.”

(3) the middle name of the 9/11 victim in line 4 of Exhibit B-3 to ECF No. 7527 be changed from “Girard” to “Gerard.”

Dated: New York, New York  
August 17, 2022

/s/ Jerry S. Goldman  
Jerry S. Goldman, Esq.